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6 Movant, *Pro Se*

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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION
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14 IN RE DMCA 512(H) SUBPOENA TO
15 DYNADOT INC.
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Case No.: 3:25-mc-80138-TLT

**L.R. 16-9(a) DECLARATION
REGARDING EFFORTS TO OBTAIN
COOPERATION**

DATE: July 31, 2025

TIME: 2:00 PM

JUDGE: Hon. Trina L. Thompson

DECLARATION OF NIMA GHARAVI

I, Nima Gharavi, declare as follows:

1. On July 18, 2025, I sent correspondence to Respondent Dynadot Inc. via both electronic mail to legal@dynadot.com and certified mail to their registered address, inviting collaboration on a joint case management statement as encouraged by Civil Local Rule 16-9(a).
2. In this correspondence, I specifically stated: "If you are willing to collaborate on a joint case management statement rather than filing separate statements, please contact me by July 22, 2025, to allow adequate time for preparation."
3. The certified mail was delivered to Respondent on July 21, 2025, as confirmed by USPS tracking.
4. As of the date of this filing, Respondent has not responded to this invitation or otherwise communicated regarding the preparation of a joint case management statement.
5. This failure to respond is consistent with Respondent's broader pattern of failing to meet deadlines throughout these proceedings, including rule-based deadlines (July 14, 2025) and court-ordered deadlines (July 15 and July 23, 2025).
6. I therefore file this separate case management statement as permitted by Civil Local Rule 16-9(a) due to Respondent's conduct which prevented the preparation of a joint statement despite my reasonable efforts to obtain cooperation.

1 7. While Respondent's failure to respond to court deadlines has rendered my motion
2 to compel unopposed by default, I respectfully request that the Court reach the
3 merits of the legal arguments presented. The precedential significance of this
4 apparent matter of first impression regarding domain registrar obligations under
5 DMCA subpoenas warrants substantive judicial analysis rather than resolution by
6 default.
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9 I declare under penalty of perjury under the laws of the United States that the foregoing
10 is true and correct.
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12 Executed on July 24, 2025, at Chicago, Illinois.
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14 /s/ Nima Gharavi
15 Nima Gharavi
16 Movant, *Pro Se*
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